

[illegible]

No. 1:24-cv-151-DCLC-CHS

 $\sim V \sim$

Defendants.

CONSOLIDATED

No. 1:24-cv-104- DCLC-CHS

 $\sim V \sim$

Defendants.

PLAINTIFF, Nathan Alexander Smith (“Plaintiff”), through counsel, and pursuant to FED. R. CIV. P., Rule 6(b)(1)(A) and E.D. TENN. L.R. 7.1(a), moves this Court to allow an additional 30 days beyond the required 21 days to file his response to the motion to dismiss filed by Meigs County Government (“County”). (DE 22).

The County filed its motion on June 20, 2024. Currently, the deadline to file the response is July 11, 2024. The author of this motion is presently preparing for two jury trials in the Eastern District of Tennessee in case numbers 1:19-cv-304 and 305, *White v. Hamilton County Government, et al.*, and *Mitchell v. Hamilton County Government, et al* which are set to begin

July 29, 2024.¹ In addition to counsel's usual case load, the complexity of the two jury trial matters include detailed trial preparation, coordination with numerous lawyers, and the preparation of a large amount of exhibits.

Additionally, the author of this motion is one of three lawyers for the Plaintiff but is the one that is tasked with the responses to motions such as that filed by the County. Thus, Plaintiff files this motion from an abundance of caution to ensure that the response to the County's motion is properly researched and drafted.

Furthermore, counsel for the County has no opposition to the motion.

Wherefore, Plaintiff moves this Court to extend the time to file his response by an additional 30 days, or until **August 12, 2024**.

Respectfully submitted,

By: /s/ Robin Ruben Flores

ROBIN RUBEN FLORES

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CERTIFICATE OF SERVICE

The undersigned attorney for Nathan Alexander Smith hereby certifies that true and exact copies of this motion have been filed and served electronically upon all parties in interest or their counsel as indicated on the receipt issued by the Court's electronic filing system.

By: /s/ Robin Ruben Flores

¹ These two cases involve former Hamilton County deputy Daniel Wilkey and allegations of a forced baptism and forced roadside strip search and body cavity search.